

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JJ KRISS and MICHAEL “CHU’DI” EJEKAM, et al.,

Plaintiffs,

vs.

BAYROCK GROUP LLC, et al.,

Defendants,

and

BAYROCK GROUP LLC, et al.,

Nominal Defendants.
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10 Civ. 3959 (LGS) (FM)

**AFFIRMATION OF J. EVAN
SHAPIRO, ESQ.**

J. EVAN SHAPIRO, an attorney duly admitted to this Court and the Courts of New York , affirms the following to be true under the penalty of perjury:

1. I am an associate with Simon & Partners LLP, the firm that represents Plaintiffs in the above-captioned action. I respectfully submit this Affirmation in support of Plaintiffs’ Response to the Objections to Chief Magistrate Judge Maas’s August 13, 2015 Report & Recommendation of Defendant Felix Satter (aka Felix Sater) (“Sater”).

2. Annexed hereto as Exhibit 1 are pages excerpted from the First Amended Complaint filed under seal in this action on June 6, 2013 (ECF No. 39). Any portion of these pages that have been stricken by the Court have been redacted from them.

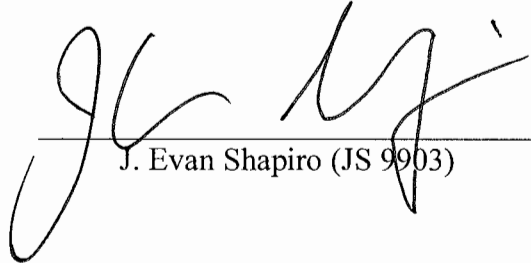
3. Annexed hereto as Exhibit 2 is a letter sent by Defendant Bayrock Group Inc. to the Court dated May 9, 2013.

4. Annexed hereto as Exhibit 3 is a letter sent by Plaintiffs to Chief Magistrate Judge Frank Maas dated July 8, 2015.

5. Annexed hereto as Exhibit 4 is a letter sent by Plaintiffs to Judge Maas on behalf of all of the parties dated July 17, 2015.

6. Annexed hereto as Exhibit 5 is a letter sent by Robert S. Wolf, counsel for Sater, to Judge Maas, on July 17, 2015.

Dated: New York, New York
September 28, 2015



J. Evan Shapiro (JS 9903)